



May 26, 2023

VIA ECF

The Honorable Sarah Netburn
S.D.N.Y. Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

Defendants believe the issues to be discussed at the June 2 conference are important and would welcome the opportunity to discuss them in person as ordered. If the Court is inclined to allow Plaintiff's counsel's request to appear by telephone, Defendants request that Defendants still be permitted to appear in person. We respectfully note that Plaintiff chose to file this action in New York with California counsel, recently added new California counsel (while Plaintiff's prior local counsel has withdrawn), and has requested telephonic appearances for every conference to date. Moreover, "the cost of travelling to New York" would seem to pale in comparison to the cost of retaining seven experts and filing four federal court actions.

Thank you for your time and attention to these issues.

Respectfully submitted,

COWAN, DEBAETS, ABRAHAMS &
SHEPPARD LLP

By: /s/ Benjamin S. Halperin

Nancy E. Wolff

Benjamin H. Halperin

CeCe M. Cole

41 Madison Avenue, 38th Floor

New York, New York 10010

Tel: (212) 974-7474

Fax: (212) 974-8474

nwolff@cdas.com

bhalperin@cdas.com

ccole@cdas.com

*Attorneys for Defendants Tracy Deebs-
Elkenaney p/k/a Tracy Wolff, Entangled
Publishing, LLC, Holtzbrinck Publishers,
LLC d/b/a Macmillan, and Universal City
Studios LLC*

Lacy H. Koonce, III
KLARIS LAW PLLC
29 Little West 12th Street
New York, NY 10014
Phone: (917) 612-5861
lance.koonce@klarislaw.com
*Attorneys for Emily Sylvan Kim and
Prospect Agency, LLC*